

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

IN RE:)	Chapter 11
)	
HEALTH DIAGNOSTIC LABORATORY,)	Case No. 15-32919-KRH
INC., ET AL.,)	
)	Jointly Administered
Debtors.)	

**BENEDICTINE HIGH SCHOOL OF RICHMOND, INC.'S
MOTION TO JOIN IN THE REPLY AND LIMITED OPPOSITION TO
MOTION FOR ENTRY OF AMENDED ORDER APPROVING PROCEDURES
GOVERNING AVOIDANCE ACTION ADVERSARY PROCEEDINGS FILED BY
MAGGIE L. WALKER GOVERNOR'S SCHOOL FOR GOVERNMENT AND
INTERNATIONAL SUTDIES FOUNDATION, INC.**

COMES NOW Benedictine High School of Richmond, Inc. ("Benedictine"), by the undersigned counsel, and hereby files this Motion to Join (the "Joinder") in the Maggie L. Walker Governor's School for Government and International Studies Foundation, Inc.'s ("Walker") Reply and Limited Opposition to Motion for Entry of Amended Order Approving Procedures Governing Avoidance Action Adversary Proceedings (the "Reply") (Docket No.2310). Benedictine hereby moves to adopt and join in the Reply on the grounds described below:

1. Benedictine is a nonprofit entity that operates an all-male, Catholic, military secondary school in the metropolitan Richmond, Virginia area. On March 13, 2017, Richard A. Arrowsmith, as Liquidating Trustee for the HDL Liquidating Trust, filed an Adversary Proceeding against Benedictine designated as Adversary Proceeding No. 17-03098. Attached to the Summons served with that Complaint was an Order Establishing Procedures for Avoidance Action Adversary Proceedings entered herein on May 16, 2016 (Docket No. 1135), which outlines certain procedures relative to the proceeding brought against Benedictine.

2. Benedictine has sought, and has obtained, two (2) thirty-day extensions to file any response to the Complaint.

JOINDER

3. On May 15, 2017 Walker filed the Reply.

4. Benedictine joins in the Reply for the reasons stated therein. Benedictine and Walker are similarly situated in that each is a nonprofit organization which has been sued in adversary proceedings that have almost identical counts alleging similar facts and legal issues. The concerns and issues raised by Walker's Reply are shared by Benedictine. As such, Benedictine joins in the Reply *in toto*.

WHEREFORE, based upon the foregoing, Benedictine respectfully prays that the Court: (1) grant the relief requested by Walker in the Reply and (2) grant Benedictine such other and further review and is just and proper.

Respectfully submitted,

BENEDICTINE HIGH SCHOOL OF
RICHMOND, INC.

By: \s\ Paul S. Bliley, Jr
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Certificate of Service

I hereby certify that on the 15th day of May, 2017, a true and correct copy of the foregoing Motion for Joinder was served on all parties receiving notice in this case through the ECF System.

\s\ Paul S. Bliley, Jr.
Paul S. Bliley, Jr.